

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ANGELA CAPUTO, on behalf of herself and all others similarly situated,

Plaintiffs,
– against –

SCOTT W. EPSTEIN, ANTIN, EHRLICH & EPSTEIN LLP, AND JEFFREY S. ANTIN,

Defendants.

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DOC #: _____
DATE FILED: <u>3/12/2025</u>

Case No.: 1:24-cv-05836 (JHR)

**[PROPOSED]
RULE 68 JUDGMENT**

WHEREAS, on July 31, 2024, Plaintiff Angela Caputo (“Plaintiff”) filed this action against Defendants Antin, Ehrlich & Epstein LLP, Scott W. Epstein, and Jeffrey S. Antin (collectively “Defendants”); and

WHEREAS, on February 26, 2025, pursuant to Rule 68 of the Federal Rules of Civil Procedure, and in order to effectuate a settlement reached by the parties, Defendants served on Plaintiff Defendants’ Notice of Offer of Judgment to Plaintiff (Defendants’ Offer of Judgment”); and

WHEREAS, on March 5, 2025, Plaintiff accepted Defendants’ Offer of Judgment.

NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

1. Defendants shall pay Plaintiff the total sum of One Hundred Twenty Thousand and Zero Cents (\$120,000.00) (the “Judgment Amount”). The Judgment Amount includes all compensatory damages, statutory damages, attorneys’ fees incurred to date, litigation expenses, and costs of litigation available under all federal, state, or local statutes.

2. This judgment shall be in full satisfaction of all federal, state, and local statutory and/or common law claims or rights that Plaintiff may have to damages, or any other form of relief, arising out of the alleged acts or omissions of Defendants or any of their past, present, and future officers, directors, partners, stockholders, members, managers, employees, parent entities, subsidiary entities, affiliates, insurers, and to the predecessors, successors, heirs, executors, administrators, representatives and assigns of each of the foregoing, each in their capacity as such, in connection with the facts and circumstances that are the subject of this action and contained in Plaintiff's pleadings.

3. This offer of judgment is made for the purposes specified in Rule 68 of the Federal Rules of Civil Procedure, and in order to effectuate a voluntary settlement of the action, and is not to be construed as an admission of liability by Defendants or any of their past, present, and future officers, directors, partners, stockholders, members, managers, employees, parent entities, subsidiary entities, affiliates, insurers, and to the predecessors, successors, heirs, executors, administrators, representatives, and assigns of each of the foregoing, each in their capacity as such, or that Plaintiff has suffered any damages in connection with the facts and circumstances that are the subject of this action.

4. Acceptance of this offer of judgment will act as a general release and discharge by Plaintiff of Defendants and their past, present, and future officers, directors, partners, stockholders, members, managers, employees, parent entities, subsidiary entities, insurers, and to the predecessors, successors, heirs, executors, administrators, representatives, and assigns of each of the foregoing, each in their capacity as such, from any and all claims, causes of action, suits, demands, rights, liabilities, damages, lawsuits, losses, fees, costs or expenses of any kind whatsoever, whether known or unknown, including any monetary, injunctive or declaratory relief

relating thereto from the beginning of time to the date that judgment is entered. Acceptance of this offer of judgment will also act as a limited release by Defendants of Plaintiff, specifically that Defendants, on behalf of themselves and their respective heirs, executors, successors and assigns, hereby release and discharge Plaintiff Angela Caputo and her heirs, executors, successors and assigns, from any and all claims, causes of action, suits, or demands, whether known or unknown, from the beginning of time to the date that judgment is entered, but limited to any claims that were or could have been raised in defense of this action and any claims related to the parties' positions taken in this action.

5. Acceptance of this offer of judgment also will operate to waive Plaintiff's rights to any claim of interest on the amount of the judgment.

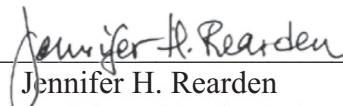
6. The Judgment Amount shall be paid within forty-five (45) days following the entry of this judgment.

7. Plaintiff shall file the Satisfaction of Judgment within three (3) days after receiving the Judgment Amount and the same has cleared.

8. The Clerk of the Court is respectfully directed to close this case with prejudice.

SO ORDERED:

Dated: March 12, 2025


Jennifer H. Rearden
United States District Judge

Any pending motions are moot. All conferences are canceled. The Clerk of Court is directed to close the case.